

REMARKS

In the Office Action dated 12/15/2005, claims 1-7, 9-20, 22-25, 27-28, 30, and 32-39 were rejected under 35 U.S.C. §103(a) as being unpatentable over Zellner et al. (U.S. Pub. No. 2004/0088345) in view of Reisman (U.S. Patent 6,658,464). Under MPEP 2143.03, in order to establish a *prima facie* case of obviousness, the prior art reference or combination of references must teach or suggest all of the limitations of a claim. A *prima facie* case of obviousness also requires that there be some teaching, suggestion, or motivation to modify the references either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. MPEP 2143.01. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.

Applicants note that the art of record fails to teach or suggest all of the limitations recited in each independent claim, particularly in the arrangement required by each of the independent claims. Thus, a case of obviousness in accordance with MPEP 2143.03 cannot be established. For instance, with respect to present independent Claim 1, Applicants note that the claim recites the encoding of an embedded navigation link so that it appears to be associated with a second domain, when in fact the encoded embedded navigation link continues to be actually associated with a first domain. The first and second domains are remote relative to the user. Applicants appreciate the Office's concession on page 4 of the Office Action that Zellner fails to teach these limitations. However, Applicants submit that Reisman fails to make up for this deficiency of Zellner. In particular, Reisman teaches the conversion of links to point to local locations on a user's system so that the user can view web content offline. The treatment of links recited in Claim 1 differs in that the recited link continues to be associated with the first domain, despite having the *appearance* of being associated with the second domain. In addition, Claim 1 recites the modification of links relative to remote domains, whereas Reisman teaches the modification of links relative to a remote location and a local location. (See, e.g., Reisman at Col. 36, l. 60 through Col. 37, l. 13; Col. 41, l. 1 through Col. 43, l. 11). The combined art of record thus fails to render present Claim 1 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Amended independent Claim 13 recites an annotation server that is configured to encode a first or second content portion to create an appearance to the user as if both content portions originate from a common domain that is remote relative to the user. The first and second content portions continue to originate from respective first and second domains, which are each remote relative to the user, despite the artificial appearance that they originate from a common domain. Applicants appreciate the Office's concession on page 10 of the Office Action, with reference to claims 33 and 38, that Zellner fails to teach an annotation server in communication with an automated support system. However, Applicants submit that Reisman fails to make up for this deficiency of Zellner. In particular, to the extent that Reisman teaches any annotation server at all, Reisman fails to teach an annotation server that is configured to encode a first or second content portion to create an appearance to the user as if both content portions originate from a common domain that is remote relative to the user, where the first and second content portions continue to originate from respective first and second domains, which are each remote relative to the user, despite the artificial appearance that they originate from a common domain. Thus, for reasons similar to those why the combined art of record fails to teach every limitation recited in Claim 1, the combined art of record fails to teach every limitation recited in Claim 13. Accordingly, the combined art of record fails to render present Claim 13 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Amended independent Claim 20 also recites the encoding of a link to create the appearance that the link is associated with a second domain that is remote relative to the user, when in fact the link is actually associated with a first domain that is remote relative to the user. Thus, for reasons similar to those why the combined art of record fails to teach every limitation recited in Claim 1, the combined art of record fails to teach every limitation recited in Claim 20. Accordingly, the combined art of record fails to render present Claim 20 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Similarly, amended independent Claim 25 recites the encoding of a link to create an appearance that the link is associated with a second domain that is remote relative to the user; while the encoded link continues to actually point to a location in the first domain despite the

encoding. Thus, for reasons similar to those why the combined art of record fails to teach every limitation recited in Claim 1, the combined art of record fails to teach every limitation recited in Claim 25. Accordingly, the combined art of record fails to render present Claim 25 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Amended independent claims 30 and 36 each recite a data collection module that records data related to an actual end-user support session involving the end-user. The data collection module further provides an update to a knowledge database, wherein the update relates to the actual end-user support session. Applicants submit that these limitations are neither taught nor suggested by the combined art of record. Applicants are at a loss as to how paragraphs [0057] and [0058] of Zellner could reasonably be read to even remotely disclose these limitations, as stated in the Office Action. Indeed, such teachings cannot be found anywhere in Zellner. Applicants also cannot see how or where Zellner teaches the automated support server, *configured to provide automated support to an end-user*, as recited in claims 30 and 36, is taught or suggested by Zellner. Furthermore, Reisman does not make up for these deficiencies of Zellner. Accordingly, the combined art of record fails to render present Claims 30 and 36 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Furthermore, even if the combined art of record taught or suggested all of the elements of any of the present claims, the art is devoid of any suggestion or motivation to modify or combine the teachings of the references in order to obtain the claimed invention. Indeed, MPEP 2143.01 admonishes that “[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.” (emphasis in original). *Actual evidence* of a suggestion, teaching or motivation to combine prior art references must be shown. *In re Dembiczak*, 50 USPQ2d 1614 (Fed.Cir. 1999). Broad *conclusory statements* regarding the teaching of references, standing alone, simply *are not evidence*. *Id.* Accordingly, the Office’s conclusory assertion that “Motivation would have been to provide the end user with an interactive and intelligent support session” amounts to no more than the examiner’s subjective personal opinion, having no objective evidentiary support, falls far short of the requirements of MPEP 2143.01. Ultimately, the Office Action fails to provide the requisite *evidence* in the prior art suggesting the desirability of the combinations

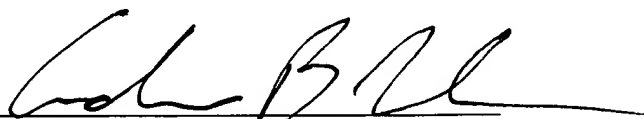
claimed herein, but instead relies solely on conclusory statements and impermissible hindsight reconstruction. Because the motivation required by MPEP 2143.01 is lacking, Applicants respectfully request that the rejections be withdrawn.

Beyond the foregoing shortcomings with respect to the independent claims, Applicants further note that the dependent claims include additional limitations not taught or suggested in the art of record, thus forming independent basis for novelty and non-obviousness.

To the extent that the present amendments constitute a narrowing of the claims, such narrowing of the claims should not be construed as an admission as to the merits of the prior rejections. Indeed, Applicants traverse the rejections and preserve all rights and arguments. While Applicants have noted several distinctions over the art of record, Applicants note that several other distinctions exist, and Applicants preserve all rights and arguments with respect to such distinctions.

Based on the foregoing, all pending claims are in a condition for allowance. Accordingly, Applicants submit that all pending claims overcome the rejections presented in the Office Action, and respectfully request reconsideration and a notice of allowance.

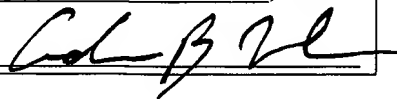
Respectfully Submitted,



Andrew B. Ulmer (Reg. No. 57,003)  
FROST BROWN TODD LLC  
2500 PNC Center  
201 East Fifth Street  
Cincinnati, Ohio 45202-4182  
513-369-4811 (direct)  
513-651-6981 (fax)

**Certificate of Mailing**

The undersigned certifies that this correspondence was deposited with the U.S. Postal Service with sufficient postage as first class mail and addressed to "Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" on this 15<sup>th</sup> day of March, 2006.



CinLibrary 1615083v.1